

1 PHILLIP A. TALBERT  
United States Attorney  
2 ALYSON A. BERT  
Assistant U.S. Attorney  
3 2500 Tulare Street, Suite 4401  
Fresno, California 93721  
4 Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

5 Attorneys for the United States

6

7

8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$1,167,233.00 IN  
U.S. CURRENCY,

15 Defendant.

CASE NO.

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America, potential claimant Sharon  
18 Mann (“Mann” or “claimant”), by and through their respective counsel, and potential claimant, Jairi Carter  
19 (“Carter” or “claimant”), appearing *in propria persona*, as follows:

20 1. On or about February 7, 2023, claimant Sharon Mann filed a claim in the administrative  
21 forfeiture proceedings with the U.S. Customs and Border Protection with respect to the Approximately  
22 \$1,167,233.00 in U.S. Currency (hereafter “defendant currency”), which was seized on December 13, 2022.

23 2. On or about March 15, 2023, claimant Jairi Carter filed a claim in the administrative  
24 forfeiture proceedings with the U.S. Customs and Border Protection with respect to the Approximately  
25 \$1,167,233.00 in U.S. Currency (hereafter “defendant currency”), which was seized on December 13, 2022.

26 3. The U.S. Customs and Border Protection has sent the written notice of intent to forfeit  
27 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person  
28 to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the

1 claimants have filed a claim to the defendant currency as required by law in the administrative forfeiture  
2 proceeding.

3       4. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
4 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency  
5 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
6 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.  
7 That deadline is May 8, 2023.

8       5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
9 to July 7, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
11 subject to forfeiture.

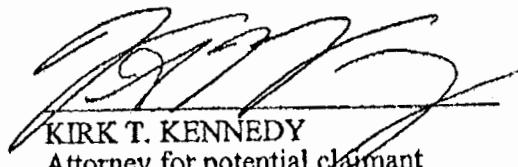
12       6. Accordingly, the parties agree that the deadline by which the United States shall be required  
13 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
14 the defendant currency is subject to forfeiture shall be extended to July 7, 2023.

15 Dated: May 5, 2023

PHILLIP A. TALBERT  
United States Attorney

16  
17 Dated: May 5, 2023

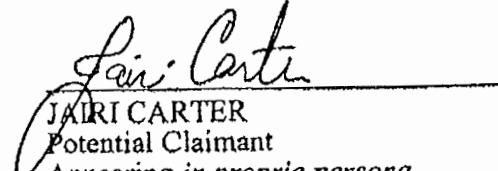
/s/ Alyson A. Berg  
ALYSON A. BERG  
Assistant U.S. Attorney



18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

KIRK T. KENNEDY  
Attorney for potential claimant  
Sharon Mann

Dated: May 5, 2023



JAIRI CARTER  
Potential Claimant  
Appearing *in propria persona*

IT IS SO ORDERED.

Dated:                 

UNITED STATES DISTRICT JUDGE